## **OAR Box 1192**

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July 11, 1990

Mary T. Smith
Director, Field Operations & Support Division
U.S. Environmental Protection Agency
401 M Street S.W.
Washington, DC 20460

Dear Ms. Smith:

Sinclair Oil Corporation submits the following comments on the Ethyl Corporation's application for EPA to grant a waiver allowing the gasoline additive methylcyclopentadienyl manganese, tricarbonyl (MMT). Sinclair strongly believes MMT is an impressive gasoline additive, capable of reducing mobile source emissions as well as yielding octane benefits, and we urge EPA to approve the waiver.

Sinclair is a small refiner as defined by the Clean Air Act and as such is limited by personnel and financial constraints. Unlike major oil companies with substantial capabilities, Sinclair rélies on commercially available and costeffective additives in the formulation of our gasolines. change fuel compositions in the 1990's will correspondingly require the availability of cost-effective additives such as MMT, especially for smaller facilities. Given the extraordinary costs refiners will incur with pending Clean Air legislation, which we believe will be enacted, Sinclair strongly believes requests such as the MMT: waiver should be approved, absent conclusive evidence the additive raises serious health and safety concerns.

Sincerely

Clint W. Ensign, Manager Government Relations CC: Mr. Dale Ensign, Executive Vice President Sinclair Oil Corporation

The Honorable Jake Garn, United States Senate

The Honorable Orrin Hatch, United States Senate

Mr. David C. Wilson, Ethyl Canada Inc.